12 June 1980

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SUBJECT: Standardization of Security Proecdures

- 1. As the Intelligence Community moves toward implementing the policies set forth in E.O. 12036, there will be opportunity to standardize many disparate procedures on the same subjects now followed by the Departments and Agencies. The move toward a single special access program (APEX) is an example. The SECOM move toward fashioning a uniform set of physical security procedures for the protection of sensitive compartmented intelligence is another. This trend toward standards should be continued.
- 2. As a first step, disparate procedures should be identified in general terms. When further analysis shows that they are merely preferential or were developed over time without clear reason or purposeful goal, they should be reviewed critically to see if they cannot be made uniform throughout the Intelligence Community.
  - 3. Some areas worthy of such attention include:
  - Investigative, adjudication and reinvestigation procedures
    - Personal History Statements
  - Clearance or special access certification procedures.

There are positive and negative factors to be considered in any proposal for greater uniformity and standardization in security procedures.

- 4. Advantages or positive factors include:
- a. Economies There would be manpower and dollar savings if procedures are standardized. There would be savings if personal history statements were made standard rather than have the 12 different ones now used.
- b. Confidence Would be greater among and between agencies if investigations were known to be of equal scope and depth of coverage, and if all agencies applied the same criteria in their evaluation and adjudication procedures.
- c. Time Common acceptance of procedures would shorten the time needed to transfer clearances or certify special access approvals. It would also help make better use of the limited technical personnel base in industry.
- 5. Disadvantages or negative factors include:
- a. Costs Would increase for some agencies if the agreed standards result in an increased scope of their present investigations.
- b. Confidence Some agencies may have reduced confidence in personnel security screening procedures if the agreed new standards are of lesser scope than their present ones.
- c. Unintended There may be unanticipated and severe costs to national security if standards are set at such a low level as to result in poor personnel screening. Subjective evaluations in this area can be avoided by relying on recent studies that objectively assess optimum investigative procedures.
- d. Societal Definition of contemporary mores and privacy is fluid and subject to public debate. The government finds itself in litigous times and judicial processes are now seen to be addressing questions of life styles which were viewed previously as automatic bars to Federal employment. Each department and agency is concerned that their procedures may be adversely affected by legal actions. There is comfort drawn from being considered different or

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unique from other agencies. Adopting a uniform procedure is viewed as broadening the target. Any hits taken under a concept of "common practices" is thus seen as a threat to the individuality of the tenets and policy of a given agency. For example, if the Army is prohibited from cancelling a TOP SECRET clearance held by an admitted homosexual, the Department of State does not feel its procedures and practices of cancelling the TS clearance are threatened under today's interagency structure. If common or standard personnel procedures are mandated, then there would be a spill-over and wide reaching ramification for cases adjudicated contrary to those standards.

6. Intelligence Community members are likely to object to efforts to foster a least common denominator as the community standard. They may be receptive to carefully drawn and fully coordinated proposals to establish standards at a meaningful level in terms of providing positive security assurances. When new standards so developed pose measurable resource problems for departments and agencies, implementation dates should allow enough time to program needed funds into the ongoing budget process.

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